UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

ROLANDA JOHNSON-SHORTER,)
Plaintiff,) Civil Action File No.:
v.)
SMITH TRANSPORT, INC., GERALD TICKLE, ARCH INSURANCE COMPANY, ABC ENTITY, and JOHN DOE,))))
Defendants.)))

DEFENDANT ARCH INSURANCE COMPANY'S NOTICE OF REMOVAL

TO: PLAINTIFF'S COUNSEL

N. John Bey
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Shawn Richardson
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Bey & Associates, LLC
191 Peachtree Street, NE
Suite 3230
Atlanta, Georgia 30303

PLEASE TAKE NOTICE that Defendant, Arch Insurance Company (hereinafter "Arch"), by and through its undersigned counsel of record, and pursuant to U.S.C. §§ 1441 and 1332, file this Notice of Removal of this action from the State

Court for the County of Dekalb, State of Georgia, where it is now pending, to the United States District Court for the Northern District of Georgia, Atlanta Division.

In support of this Notice of Removal, Arch has filed contemporaneously herewith its Brief in Support of Removal and accompanying Exhibits, including the pleadings and entire record of this matter.

WHEREFORE, Defendant Arch Insurance Company respectfully requests that this Court enter an Order removing this action from the State Court for the County of Dekalb, State of Georgia, where it is now pending, to the United States District Court for the Northern District of Georgia, Atlanta Division.

Respectfully submitted, this 22nd day of May, 2023.

MOSELEY MARCINAK LAW GROUP, LLP

/s/ Blair J. Cash

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CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that the foregoing document was prepared in accordance with N.D. Georgia Local Rule 5.1 (C). Specifically, counsel certifies that he has used 14 point Times New Roman as the font in these documents.

MOSELEY MARCINAK LAW GROUP, LLP

/s/ Blair J. Cash

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing pleading upon all parties to this matter by e-filing the same with the Court's CM-ECF system and via e-mail, addressed to counsel of record as follows:

N. John Bey

john@beyandassociates.com

Shawn@beyandassociates.com

Bey & Associates, LLC

191 Peachtree Street, NE

Suite 3230

Atlanta, Georgia 30303

This 22nd day of May, 2023.

MOSELEY MARCINAK LAW GROUP, LLP

/s/ Blair J. Cash
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